

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA**

GRADY O. HUMPHREYS, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	CV NO.:2:07-CV-607-WKW
)	
A.O. SMITH ELECTRICAL)	
PRODUCTS COMPANY, et al.,)	
)	
Defendants)	

NOTICE OF POTENTIAL TAG-ALONG ACTION

COMES NOW, the Defendant Pneumo Abex LLC, successor in interest to Abex Corporation (“Abex”), and hereby gives notice to this Court of the transmittal of the attached notification letter to the Clerk of the Judicial Panel of Multi-District Litigation (“MDL”) identifying a potential “tag-along action” to the cases transferred and consolidated by the Panel’s Order and Opinion of July 29, 1991, to the United States District Court for the Eastern District of Pennsylvania and assigned to the Honorable Charles R. Weiner. See August 13, 2007 Notification Letter attached hereto as Exhibit A.

The MDL Panel’s Order and Opinion transfers all asbestos lawsuits pending in the federal courts to the Eastern District of Pennsylvania for

coordinated and consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407. This order also applies to “tag-along actions,” or actions involving common questions of fact filed after January 17, 1991 filling of the Panel’s Order to Show Cause. The above captioned action is essentially identical to the abundant other asbestos actions which are the subject of this MDL proceeding. Abex, therefore, fully expects that the MDL panel will grant its request to transfer this action, and accordingly expect that this action will be transferred to the same court as a tag-along to these other actions.

Respectfully submitted,

s/ Brian M. Blythe

Brian M. Blythe
One of the Attorneys for
Pneumo Abex LLC

OF COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that on August 13, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

All counsel of record

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

None

s/ Brian M. Blythe



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August 13, 2007

Mr. Michael Beck
Clerk of the Panel on
Multidistrict Litigation
Thurgood Marshall Federal Judiciary Building
One Columbus Circle, N.E.
Room G-225, North Lobby
Washington, D.C. 20002-8004

RE: In Re Asbestos Products Liability Litigation -- MDL Docket No. 875

Dear Mr. Beck:

My firm represents defendant Pneumo Abex LLC in the case captioned Grady O. Humphreys, et al, vs. A. O. Smith Electrical Products Company, et al., in the United States District Court for the Middle District of Alabama, Case No. 2:07-CV-607-WKW. I enclose herewith a copy of the Complaint. As expressly stated in the attached Complaint, all of Plaintiffs' claims concern alleged asbestos exposure. We hereby give notice, as required by Rule 13(e) of the Rules of Procedure of the Judicial Panel on Multidistrict Litigation, of the pendency of this case. We request that the MDL Panel consider this case as a "tag-along action" to the cases transferred to the MDL proceeding entitled In Re Asbestos Products Liability Litigation, MDL Docket No. 875, and that the "tag-along" procedures be utilized in transferring this action to the Eastern District of Pennsylvania.

Thank you for your attention in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Blythe', is written over a horizontal line.

Brian M. Blythe

Enclosures: 1